

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK

FEDERAL ELECTION COMMISSION

2008 AUG 19 P 12:00

In the matter of: Vern Buchanan
Don Caldwell
Brad Combs
Venice Nissan Dodge
Sarasota 500, LLC,
d/b/a Sarasota Ford
Buchanan Automotive
Holdings, Inc.

MUR No. 6054

COMPLAINT

1. Citizens for Responsibility and Ethics in Washington ("CREW"), Melanie Sloan, Carlo A. Bell and David J. Padilla bring this complaint before the Federal Election Commission ("FEC") seeking an immediate investigation and enforcement action against Vern Buchanan, Don Caldwell, Brad Combs, Venice Nissan Dodge, Sarasota 500, LLC d/b/a Sarasota Ford and Buchanan Automotive Holdings, Inc. for direct and serious violations of the Federal Election Campaign Act ("FECA").

Complainants

2. Complainant CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the right of citizens to be informed about the activities of government officials and to ensuring the integrity of government officials. CREW is dedicated to empowering citizens to have an influential voice in government decisions and in the governmental decision-making process. CREW uses a combination of research, litigation, and advocacy to advance its mission.

3. In furtherance of its mission, CREW seeks to expose unethical and illegal conduct of those involved in government. One way CREW does this is by educating citizens regarding the integrity of the electoral process and our system of government. Toward this end, CREW monitors the campaign finance activities of those who run for

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federal office and publicizes those who violate federal campaign finance laws. Through its website, press releases and other methods of distribution, CREW also files complaints with the FEC when it discovers violations of the FECA. Publicizing campaign finance violators and filing complaints with the FEC serves CREW's mission of keeping the public informed about individuals and entities who violate campaign finance laws and deterring future violations of campaign finance law.

4. In order to assess whether an individual, candidate, political committee or other regulated entity is complying with federal campaign finance law, CREW needs the information contained in receipts and disbursements reports that political committees must file pursuant to the FECA, 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. CREW is hindered in its programmatic activity when an individual, candidate, political committee or other regulated entity fails to disclose campaign finance information in reports of receipts and disbursements required by the FECA.

5. CREW relies on the FEC's proper administration of the FECA's reporting requirements because the FECA-mandated reports of receipts and disbursements are the only source of information CREW can use to determine if a candidate, political committee or other regulated entity is complying with the FECA. The proper administration of the FECA's reporting requirements includes mandating that all reports of receipts and disbursements required by the FECA are properly and timely filed with the FEC. CREW is hindered in its programmatic activity when the FEC fails to properly administer the FECA's reporting requirements.

6. Complainant Melanie Sloan is the executive director of Citizens for Responsibility and Ethics in Washington, a citizen of the United States and a registered voter and resident of the District of Columbia. Carlo A. Bell and David J. Padilla are citizens of the United States and registered voters and residents of the Thirtieth

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Congressional District of Florida. As registered voters, Ms. Sloan, Mr. Bell and Mr. Padilla are entitled to receive information contained in reports of receipts and disbursements required by the FECA, 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. Ms. Sloan, Mr. Bell and Mr. Padilla are harmed when a candidate, political committee or other regulated entity fails to report campaign finance activity as required by the FECA. See FEC v. Akins, 524 U.S. 11, 19 (1998), quoting Buckley v. Valeo, 424 U.S. 1, 66-67 (1976) (political committees must disclose contributors and disbursements to help voters understand who provides which candidates with financial support). Ms. Sloan, Mr. Bell and Mr. Padilla are further harmed when the FEC fails to properly administer the FECA's reporting requirements, limiting their ability to review campaign finance information.

Respondents

7. Vern Buchanan is a United States Congressman representing the Thirteenth Congressional District of Florida. Vern Buchanan is also, on information and belief, the sole shareholder of Buchanan Automotive Holdings, Inc. ("BAH"). BAH is, on information and belief, the managing member of five Florida limited liability companies that operate five different automobile dealerships, including Venice Nissan Dodge and Sarasota 500, L.L.C. d/b/a Sarasota Ford ("Sarasota Ford"). Don Caldwell is a partner in Venice Nissan Dodge. Brad Combs is a finance manager at Venice Nissan Dodge.

Factual Allegations

8. According to the sworn affidavits of Carlo A. Bell and David J. Padilla, attached hereto as Exhibits A and D respectively, as well as multiple news accounts, at least seven employees of BAH automobile dealerships, including employees of Venice Nissan Dodge and Sarasota Ford, were either reimbursed with corporate funds for making \$1,000 contributions to Rep. Buchanan's 2006 congressional campaign, or were coerced into making contributions to Rep. Buchanan's 2006 congressional campaign.

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9. The affidavit of Carlo A. Bell, the former finance director at Venice Nissan Dodge, states that on September 15, 2005, Don Caldwell, the general manager of Venice Nissan Dodge, called him into a meeting with Jack Prater, the Dodge sales manager, and Jason Martin, the Dodge finance manager and Mr. Caldwell's nephew. Exhibit A at ¶ 2. "Mr. Caldwell shut the door to the office and told the three of us that we needed to contribute to the campaign of Vern Buchanan, who was then running for Congress in Florida's 13th congressional district. Mr. Caldwell was holding cash in his hand at the time and said that the company would reimburse us for our contributions. He explained that the company would give us \$1,000 cash in exchange for our writing \$1,000 checks to the campaign." Exhibit A at ¶ 3. Mr. Bell asked Mr. Caldwell if this was legal. "Mr. Caldwell did not answer [the] question, instead asking . . . if I was on the team or not . . . Afraid that [he] might lose [his] job if [he] refused, [Mr. Bell] replied yes, [he] was a part of the team and agreed to write the check." Exhibit A at ¶ 4.

10. Mr. Caldwell then handed Mr. Bell \$1,000 in cash. He also handed \$1,000 in cash to both Mr. Prater and Mr. Martin, who accepted it. Exhibit A at ¶ 5. Mr. Bell later discussed the meeting with Mr. Prater and Mr. Martin, and they all agreed that it seemed wrong to accept \$1,000 in cash to write checks to the Buchanan campaign, "but we were all afraid that refusing to do so might endanger our employment with Venice Nissan Dodge." Exhibit A at ¶ 6. Mr. Bell subsequently learned that two other Venice Nissan Dodge employees, Marvin White and William Mullins, also received \$1,000 cash reimbursements when they agreed to write checks to the Buchanan campaign. Exhibit A at ¶ 8. See also Vern Buchanan for Congress, FEC Form 3, October Quarterly Report, October 14, 2005, pp. 76, 88, 99, 129 (attached as Exhibit C).

11. On September 15, 2005, the same day he was given the \$1,000 by Mr. Caldwell, Mr. Bell deposited \$960 in cash to his bank account, keeping the remaining \$40 for spending money. On September 17, 2005, Mr. Bell wrote a check to the Buchanan

campaign for \$1,000. Exhibit A at ¶ 7. Copies of the deposit slip and Mr. Bell's cancelled check are attached as Exhibit B.

12. Mr. Bell's account of the reimbursement scheme is confirmed by the sworn affidavit of David J. Padilla, who was a finance manager at Venice Nissan Dodge at the time. According to Mr. Padilla's affidavit, in September 2005 he was approached by Brad Combs, another finance manager at Venice Nissan Dodge, who told him that "Mr. Buchanan needed campaign contributions and that anyone who made a contribution would get his money back plus additional compensation." Exhibit D at ¶ 2. When Mr. Padilla refused to participate in the reimbursement scheme, Mr. Combs told him "that all of the managers were being asked to contribute and that many were planning to accept reimbursements in exchange for contributions." Exhibit D at ¶ 4. Mr. Padilla later discovered that several other Venice Nissan Dodge employees, including Mr. Bell, Mr. Prater and Mr. Martin, had been reimbursed for making \$1,000 contributions to Mr. Buchanan's congressional campaign. Exhibit D at ¶¶ 5&6.

13. Nor was the reimbursement scheme limited to Venice Nissan Dodge. Joseph Kezer, the former finance director of Sarasota Ford, told the Capitol Hill newspaper Roll Call that he personally observed campaign finance violations ahead of Rep. Buchanan's 2006 general election and that some of the \$8 million spent by the Buchanan campaign in 2006 "was laundered corporate cash funneled through higher-ups at Buchanan's numerous dealerships." Matthew Murray, *Buchanan Faces Another Lawsuit*, Roll Call, June 2, 2008 (attached as Exhibit E). Mr. Kezer told Roll Call that "he personally fielded phone calls from other dealership executives wanting to know whether company reimbursement checks they had cashed put them in legal peril. 'After it happened, a couple of [managers] contacted me because they were concerned,' Kezer said. 'I didn't know at the time . . . whether it was a good thing or a bad thing.'" See Exhibit E.

COUNT I

14. FECA and FEC regulations specifically prohibit corporations from using job discrimination, financial reprisals, or the threat of job discrimination or financial reprisals to force employees to make political contributions. 2 U.S.C. § 441b(b)(3)(A); 11 C.F.R. § 114.5(a)(1). Corporations are also prohibited from facilitating the making of contributions to federal candidates. FEC regulations specifically cite as an example of illegal corporate facilitation "Using coercion, such as the threat of a detrimental job action, the threat of any other financial reprisal, or the threat of force, to urge any individual to make a contribution or engage in fundraising activities on behalf of a candidate or political committee." 11 C.F.R. § 114.2(f)(2)(iv).

15. By using coercion, including the implied threat of detrimental job action, to force employees of the Buchanan automobile dealerships to make contributions to the 2006 Buchanan campaign, Vern Buchanan, Don Caldwell, Brad Combs, Venice Nissan Dodge, Sarasota Ford and BAH all violated 2 U.S.C. § 441b(b)(3)(A) and 11 C.F.R. § 114.2.

COUNT II

16. FECA and FEC regulations both prohibit the making of a contribution in the name of a person other than the true source of the contribution. 2 U.S.C. § 441f; 11 C.F.R. § 110.4(b)(1)(i).

17. By reimbursing employees for contributions made to the 2006 Buchanan campaign, Vern Buchanan, Don Caldwell, Brad Combs, Venice Nissan Dodge, Sarasota Ford and BAH all violated 2 U.S.C. § 441f and 11 C.F.R. § 110.4(b)(1)(i).

COUNT III

18. FECA and FEC regulations both prohibit corporations from making contributions in connection with any federal election, including elections for the House of

Representatives. 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.2(a).

19. By reimbursing employees with corporate funds for contributions made to the 2006 Buchanan campaign, BAH, Venice Nissan Dodge and Sarasota Ford, and Vern Buchanan, Don Caldwell and Brad Combs, as officers or directors of BAH and/or Venice Nissan Dodge and/or Sarasota Ford, violated both 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.2(a).

CONCLUSION

WHEREFORE, Citizens for Responsibility and Ethics in Washington, Melanie Sloan, Carlo Bell and David Padilla request that the Federal Election Commission conduct an investigation into these allegations, declare the respondents to have violated the Federal Election Campaign Act and applicable FEC regulations, and impose sanctions appropriate to these violations and take such further action as may be appropriate, including referring this case to the Justice Department for investigation of any violations of 2 U.S.C. §§ 441b(a) & 441f.

Verification

Citizens for Responsibility and Ethics in Washington, Melanie Sloan, Carlo Bell and David Padilla, acting through Melanie Sloan, hereby verify that the statements made in the attached Complaint are, upon information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001.



Melanie Sloan

Sworn to and subscribed before me this 19th day of August, 2008.




Notary Public

NAOMI SELIGMAN STEINER
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires June 30, 2011

District of Columbia: SS

Subscribed and sworn to before me, in my presence,

this 19th day of August, 2008



Notary Public, D.C.

My commission expires June 30, 2011

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EXHIBIT A

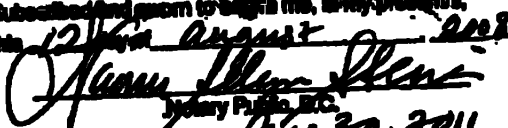
Affidavit of Carlo A. Bell

1. I was employed at Venice Nissan Dodge in Sarasota, Florida from 2001 through 2007.
2. On September 15, 2005, while I was serving as Venice Nissan Dodge's finance director, Don Caldwell, the general manager for the company and my direct supervisor, called me into a meeting in the office of Jack Prater, Dodge sales manager. Also present was Jason Martin, Dodge finance manager and Mr. Caldwell's nephew.
3. Mr. Caldwell shut the door to the office and told the three of us that we needed to contribute to the campaign of Vern Buchanan, who was then running for Congress in Florida's 13th congressional district. Mr. Caldwell was holding cash in his hand at the time and said that the company would reimburse us for our contributions. He explained that the company would give us \$1,000 cash in exchange for our writing \$1,000 checks to the campaign.
4. I told Mr. Caldwell that this did not seem right to me and asked him if it was legal. Mr. Caldwell did not answer my question, instead asking me if I was on the team or not. I sat quietly for a minute looking at Mr. Caldwell who stared back at me, waiting for my answer. Afraid that I might lose my job if I refused, I replied yes, I was a part of the team and agreed to write the check.
5. Mr. Caldwell handed me \$1,000 in cash. Neither Mr. Prater nor Mr. Martin spoke, but Mr. Caldwell handed them \$1,000 in cash as well, which they accepted.
6. After leaving the office, I discussed the matter with Mr. Prater and Mr. Martin and we all agreed that taking \$1,000 in cash for writing checks to the campaign seemed wrong, but we were all afraid that refusing to do so might endanger our employment with Venice Nissan Dodge.
7. The day after Mr. Caldwell gave me the \$1,000, I made a cash deposit to my bank in the amount of \$960, but kept the other \$40. The day of the deposit, I wrote a check to the Buchanan campaign and handed it to Mr. Caldwell. Copies of the deposit slip verifying the \$960 deposit and my check to the Buchanan campaign are attached.
8. I later discovered that two other Venice Nissan Dodge employees, Marvin White, the used car manager, and William Hurling, a salesman, also received \$1,000 cash reimbursements when they agreed to write checks to the Buchanan campaign.
9. Prior to writing the check to the Buchanan campaign, I had never contributed to a political campaign and have not written checks to any other campaigns since that time.

I hereby attest, under penalty of perjury, that the foregoing is true and correct.


Carlo A. Bell

NOTARY PUBLIC
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires June 30, 2011

Subscribed and sworn to before me, in my presence,
this 12th day of August 2008

Notary Public, D.C.
June 30, 2011

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EXHIBIT B



Point. & Click. Bank.

FREE ONLINE BANKING @ www.libertysavingsbank.com

CARLO A BELL POD

SUMMARY OF YOUR ACTIVITY
STATEMENT DATE SEP 18 08
STATEMENT NUMBER
BEGINNING BALANCE
DEPOSIT AMOUNT +
WITHDRAWAL AMOUNT -
SERVICE CHARGE
INTEREST PAID +
ENDING BALANCE -

DEBITS

FREEDOM EXTRAS CAN BE ADDED TO ANY
LIBERTY SAVINGS BANK CHECKING
ACCOUNT FOR JUST \$2 PER MONTH.
ASK FOR DETAILS TODAY.

PREMIER
ACTIVITY BEGINNING AUG 18 08 WITHDRAWALS DEPOSITS BALANCE SUMMARY
AUG 31 CHECK NUMBER 120 REF #952854838 2808.88 8428.28
SEP 17 DEPOSIT HYDE PARK 990.00
SEP 17 DEPOSIT HYDE PARK 990.00
SEP 18 INTEREST PAID 8/18 THROUGH 8/18 334.47

CHECKS PAID ON YOUR ACCOUNT

CHECK	DATE	AMOUNT	CHECK	DATE	AMOUNT	CHECK	DATE	AMOUNT
120	08/31	2808.88						

INTEREST PAID THIS YEAR: \$ 1,808.18

INTEREST RATE AS OF:
AUG 18 08.44

SUMMARY OF YOUR DEPOSIT ACCOUNTS

ACCOUNT DESCRIPTION	ACCOUNT NUMBER	ACCOUNT BALANCE	MATURITY DATE
PREMIER			

TOTAL OF



Family growing? Ease your growing pains with a Liberty Mortgage Loan.



All deposits are insured subject to verification by the bank. Deposits may not be available for immediate withdrawal.

1804

P2

DDA Regular Deposit

09/17/08 09:24:13 027 CDR:0005 Seq:007

Tran Amt: 960.00 CK In: .00

Cash: 960.00 CK Out: .00

Balance: ...

09/18/08

☐ Notice of Hold on Deposits We are delaying the availability of \$ _____ from this

Thank



CARLO A. BELL

09-001/001

2237

DATE

9/17/06

Pay to the order of Veron Buchanan for Congress \$ 1000.00 /xx
One Thousand & 00/xx DOLLARS @ 100

LIBERTY BANK

AT THE BANK OF TAMPA
 TAMPA, FLORIDA 33602

MPG WFL 155072512 10-03-05 05 128
 CARLO A. BELL
 000001000000

CheckAmt: 1000.00
 AccountNum:
 TrfRefNum:
 SerialNum: 2237
 ProdDate: 10/03/05
 RoutingNum: 100000011

PAY TO THE ORDER OF THE BANK OF TAMPA TAMPA, FL 33602 100100000 FOR DEPOSIT ONLY VERON BUCHANAN FOR CONGRESS 21000000		00000000 09077
033834650530-0019-9 10002005-17-1842 TRC-1842 PK-02 0530-0019-9 0530-0019-9 0530-0019-9 0530-0019-9	00000000 09077	
0530-0019-9 0530-0019-9 0530-0019-9 0530-0019-9		

CheckAmt: 1000.00
 AccountNum:
 TrfRefNum:
 SerialNum: 2237
 ProdDate: 10/03/05
 RoutingNum: 100000011

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EXHIBIT C

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**Use separate schedule(s)
or each category of the
Detailed Summary PageFOR LINE NUMBER: **PAGE 79/105**
(check only one)☒ 11a ☐ 11b ☐ 11c ☐ 11d
12 13a 13b 14 15

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Vern Buchanan for Congress

A. Full Name (Last, First, Middle Initial) James A. Math		Date of Receipt 09 / 29 / 2008	
Mailing Address 1826 Scarlett Avenue		Transaction ID: C004K01	
City North Fort State FL Zip Code 34908		Amount of Each Receipt This Period 1000.00	
FEC ID number of contributing federal political committee. C		Limit Increased Due to Opponent's Spending (2 U.S.C. 441a)(4)(1a-1)	
Name of Employer Venice Human Lodge Chesses Receipt For: 2008 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify) <input type="checkbox"/>		Occupation auto sales Election Cycle-to-Date <input type="checkbox"/>	
		1000.00	
B. Full Name (Last, First, Middle Initial) Michael T. Math		Date of Receipt 09 / 29 / 2008	
Mailing Address 3413 Winding Oaks Drive		Transaction ID: C008WD1	
City Longboat Key State FL Zip Code 34228		Amount of Each Receipt This Period 2100.00	
FEC ID number of contributing federal political committee. C		Limit Increased Due to Opponent's Spending (2 U.S.C. 441a)(4)(1a-1)	
Name of Employer n/a Receipt For: 2008 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify) <input type="checkbox"/>		Occupation retired Election Cycle-to-Date <input type="checkbox"/>	
		4000.00	
C. Full Name (Last, First, Middle Initial) Michael T. Math		Date of Receipt 09 / 29 / 2008	
Mailing Address 3413 Winding Oaks Drive		Transaction ID: C008WD2	
City Longboat Key State FL Zip Code 34228		Amount of Each Receipt This Period 1000.00	
FEC ID number of contributing federal political committee. C		Limit Increased Due to Opponent's Spending (2 U.S.C. 441a)(4)(1a-1)	
Name of Employer n/a Receipt For: 2008 <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify) <input type="checkbox"/>		Occupation retired Election Cycle-to-Date <input type="checkbox"/>	
		4000.00	
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TOTAL This Period (not page this line number only)			

FEC Schedule A (Form 3) Rev. 08/2005

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SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS

 Use separate schedule(s)
 or each category of the
 Detailed Summary Page

 FOR LINE NUMBER: PAGE 05/105

(check only one)

☒ 11a ☐ 11b ☐ 11c ☐ 11d
☐ 12 ☐ 13a ☐ 13b ☐ 14 ☐ 15

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NAME OF COMMITTEE (in Full)
 Vern Buchanan for Congress

A. Full Name (Last, First, Middle Initial) Marilyn Malsky		Date of Receipt 09 / 30 / 2006
Mailing Address 8014 Audubon Manor Blvd.		Transaction ID: C008401
City Little	State FL	Zip Code 32647
FEC ID number of contributing federal political committee. C		Amount of Each Receipt This Period 2000.00
Name of Employer [blank]		Limit Increased Due to Opponent's Spending (2 U.S.C. 441a)(4)(1)(B-1)) 2000.00
Receipt For: 2008 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify) <input type="checkbox"/>		
Occupation Election Cycle-to-Date <input type="checkbox"/>		
B. Full Name (Last, First, Middle Initial) William F. Miller		Date of Receipt 09 / 25 / 2006
Mailing Address 26330 Rampart Blvd., #B		Transaction ID: C004m01
City Punta Gorda	State FL	Zip Code 33880
FEC ID number of contributing federal political committee. C		Amount of Each Receipt This Period 1000.00
Name of Employer Vernon French Dodge Darnice		Limit Increased Due to Opponent's Spending (2 U.S.C. 441a)(4)(1)(B-1)) 1000.00
Receipt For: 2008 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify) <input type="checkbox"/>		
Occupation auto sales Election Cycle-to-Date <input type="checkbox"/>		
C. Full Name (Last, First, Middle Initial) Bryan Mann		Date of Receipt 07 / 25 / 2006
Mailing Address 1531 Harrington Park Dr.		Transaction ID: C000001
City Jacksonville	State FL	Zip Code 32221
FEC ID number of contributing federal political committee. C		Amount of Each Receipt This Period 2100.00
Name of Employer self-employed		Limit Increased Due to Opponent's Spending (2 U.S.C. 441a)(4)(1)(B-1)) 4300.00
Receipt For: 2008 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify) <input type="checkbox"/>		
Occupation day spa owner Election Cycle-to-Date <input type="checkbox"/>		
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FEC Schedule A (Form 3) Rev. 03/2005

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**SCHEDULE A (FEC Form 3)
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or each category of the
Detailed Summary PageFOR LINE NUMBER: PAGE 00 / 105
(check only one)

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NAME OF COMMITTEE (In Full)

Vern Buchanan for Congress

A. Full Name (Last, First, Middle Initial) Jack Pater Mailing Address 205 Doughter Drive City State Zip Code Vero Beach FL 34989 FEC ID number of contributing federal political committee: C Name of Employer: Vero Beach Lodge Decease Receipt For: 2008 X Primary General Other (specify) <input type="checkbox"/>		Date of Receipt 09 / 28 / 2008 Transaction ID: C004031 Amount of Each Receipt This Period 1000.00 Limit Increased Due to Opponent's Spending (2 U.S.C. 441a(4)(1))
B. Full Name (Last, First, Middle Initial) J. Gary Pomeroy Mailing Address 1200 Anastasia Ave., 2nd Floor City State Zip Code Coral Gables FL 33134 FEC ID number of contributing federal political committee: B Name of Employer: The Biltmore Hotel Receipt For: 2008 X Primary General Other (specify) <input type="checkbox"/>		Date of Receipt 09 / 28 / 2008 Transaction ID: C003601 Amount of Each Receipt This Period 600.00 Limit Increased Due to Opponent's Spending (2 U.S.C. 441a(4)(1))
C. Full Name (Last, First, Middle Initial) Gary G. Prigien Mailing Address 3083 48th Avenue, N. City State Zip Code St. Petersburg FL 33714 FEC ID number of contributing federal political committee: C Name of Employer: Grady Prigien Inc. Receipt For: 2008 X Primary General Other (specify) <input type="checkbox"/>		Date of Receipt 09 / 27 / 2008 Transaction ID: C004FD1 Amount of Each Receipt This Period 2100.00 Limit Increased Due to Opponent's Spending (2 U.S.C. 441a(4)(1))

SUBTOTAL of Receipts This Page (optional) 3600.00

TOTAL This Period (last page this line number only)

FEC Schedule A (Form 3) Rev. 08/2005

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SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS

 Use separate schedule(s)
 or each category of the
 Detailed Summary Page

 FOR LINE NUMBER: **PAGE 120/185**
 (check only one)

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NAME OF COMMITTEE (In Full)

Vern Buchanan for Congress

A. Full Name (Last, First, Middle Initial) Wade L. White Mailing Address 11 Medalist Circle City State Zip Code Orlando, FL 32837 FEC ID number of contributing federal political committee: C Name of Employer United Health Care Services Receipt For: 2008 X Primary General Other (specify) Occupation auto sales Election Cycle-to-Date 1000.00		Date of Receipt 08 / 28 / 2008 Transaction ID: C004n01 Amount of Each Receipt This Period 1000.00 Limit Increased Due to Opponent's Spending (2 U.S.C. 441a)(4)(1a-1)
B. Full Name (Last, First, Middle Initial) Debbie Williams Mailing Address 232 Marcola Way City State Zip Code Indian Harbour Beach, FL 32937 FEC ID number of contributing federal political committee: C Name of Employer Toyota of Melbourne Receipt For: 2008 X Primary General Other (specify) Occupation sales rep. Election Cycle-to-Date 1700.00		Date of Receipt 08 / 28 / 2008 Transaction ID: C005U01 Amount of Each Receipt This Period 1700.00 Limit Increased Due to Opponent's Spending (2 U.S.C. 441a)(4)(1a-1)
C. Full Name (Last, First, Middle Initial) Robin Elizabeth Williams Mailing Address 1705 Hyde Park Street City State Zip Code Sarasota, FL 34238 FEC ID number of contributing federal political committee: C Name of Employer N/A Receipt For: 2008 X Primary General Other (specify) Occupation homemaker Election Cycle-to-Date 2000.00		Date of Receipt 08 / 30 / 2008 Transaction ID: C008C01 Amount of Each Receipt This Period 2000.00 Limit Increased Due to Opponent's Spending (2 U.S.C. 441a)(4)(1a-1)
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FEC Schedule A (Form 3) Rev. 05/2005

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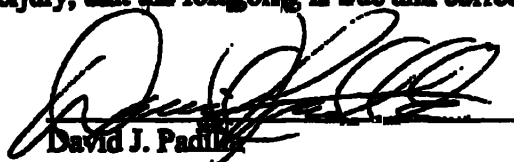
EXHIBIT D

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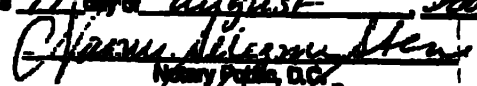
Affidavit of David J. Padilla

1. I was a finance manager at Venice Nissan Dodge and Sarasota Ford in Sarasota, Florida from 2002 through 2007.
2. In September 2005, after Vernon Buchanan announced he was running for Congress, Brad Combs, another finance manager, came into my office and told me that Mr. Buchanan needed campaign contributions and that anyone who made a contribution would get his money back plus additional compensation.
3. When Mr. Combs asked me if I wanted in on the deal, I replied, "you have to be out of your mind." I told Mr. Combs that accepting reimbursement for making a campaign contribution is against the law.
4. Mr. Combs told me that all of the managers were being asked to contribute and that many were planning to accept reimbursements in exchange for contributions. I said that I was not going to participate.
5. Soon thereafter, Carlo Bell, the finance director, told me that he had taken the deal and accepted reimbursement in return for making a contribution to the Buchanan campaign.
6. I later discovered that several other employees, including Jack Pinner and Jason Martin, also had been reimbursed for making contributions to Mr. Buchanan's congressional campaign.

I hereby attest, under penalty of perjury, that the foregoing is true and correct.


David J. Padilla

NAOMI SELIGMAN STEINER
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires June 30, 2011

District of Columbia: SS
Subscribed and sworn to before me, in my presence,
this 19 day of August, 2008

Notary Public, D.C.
My commission expires June 30, 2011

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EXHIBIT E

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Buchanan Faces Another Lawsuit

June 2, 2008

By Matthew Murray

Roll Call Staff

The latest in a series of lawsuits against Rep. Vern Buchanan (R-Fla.) alleging consumer fraud at car dealerships he owns was filed last week, turning up the heat on the freshman lawmaker and setting the stage for a long, hot summer in central Florida.

Individuals close to the lawsuits are also signaling that allegations of campaign finance violations by Buchanan could become a key plank in the growing caseload against the lawmaker — lawsuits that could number seven by July 1.

These charges are expected to include the illegal funneling of dealership money last cycle into Buchanan's campaign account.

Joseph Kezer, a former finance director at Buchanan's Sarasota Ford dealership, claimed in court papers filed Thursday that he was fired last year for exposing "fraudulent practices being employed in the sale and financing of new and used cars."

"There was so much fraud in and out of the place," Kezer said Friday in an interview with Roll Call. "They were putting so much pressure on me to both look the other way and participate ... I kept telling them, 'no,' to the point that it cost me my job."

According to Kezer's complaint, employees at Buchanan's dealership lied and forged signatures on automotive loan applications as well as misled customers, all while bilking Ford Motor Co. for bonuses by fraudulently meeting sales quotas.

Buchanan, business partner Darrin Chrisman and a dealership sales manager are named in the lawsuit.

Kezer also alleged in an interview with Roll Call that he observed campaign finance violations ahead of Buchanan's narrow 2006 victory against bank executive Christine Jennings (D). In the most expensive House race last cycle, Buchanan spent more than \$5 million of his own money, according to CQ MoneyLine, to win by 369 votes.

Buchanan is expected to face a rematch with Jennings in November.

Some of the Buchanan campaign's record \$8 million outlay in the 2006 campaign, according to Kezer, likely was laundered corporate cash funneled through higher-ups at Buchanan's numerous dealerships.

The former finance director told Roll Call that he personally fielded phone calls from other dealership executives wanting to know whether company reimbursement checks they had cashed put them in legal peril.

"After it happened, a couple of [managers] contacted me because they were concerned," Kezer said. "I didn't know at the time ... whether it was a good thing or a bad thing."

Buchanan spokeswoman Sally Tibbetts declined to answer Kezer's charges, saying only that "it's the campaign's policy that all campaign contributions are within FEC regulations."

The lawmaker's business partner, Chrisman, however, dismissed charges of consumer fraud at the dealership outright, calling Kezer "a disgruntled former employee."

"He was terminated seven months ago for poor performance," Chrisman said. "All of the charges are false. It's just a matter of sour grapes."

Chrisman also dismissed lawsuits filed May 21 by Willie Lee, another former dealership employee. In court papers, Lee alleged that he is owed back pay and was wrongly charged service fees at the dealership.

According to Chrisman, Lee was fired from the dealership "for poor customer satisfaction." He also questioned the motives behind Lee's lawsuit, which is seeking back pay for unused vacation and for a service fee he incurred when personally buying a vehicle from the dealership.

"If you're terminated, you're not entitled to your vacation pay, according to documents that he signed when he was hired," Chrisman said. "And he never came to us ... all of the sudden he just wants a couple of weeks vacation [pay]?"

Regarding allegations that Buchanan misused corporate money to finance his 2006 run, Chrisman declined to comment. He also questioned the motives behind naming Buchanan in the suit, calling him "basically a silent investor." Still, he confirmed the Congressman's corporate offices were once located at the Sarasota Ford dealership.

"I came on the scene in November 2006, so I am not really privy to what happened before," Chrisman said.

Lee and Kezer are just two of the ex-Buchanan employees — as well as two consumers — represented by Douglas Lyons, a consumer rights attorney who is working with an automotive fraud activist, Duane Overholt, in building the case against Buchanan and his dealerships.

In an interview Friday, Lyons declined to elaborate on any future lawsuits against Buchanan, but confirmed that he represents multiple people who have filed court papers against the lawmaker as his businesses.

"All I can say at this point: Where there's smoke, there's fire. We're familiar with at least four dealerships where the same activities are occurring, [and] the only common thread is [Buchanan's] ownership," Lyons said. "Based upon what we see, there are a number of illegal activities going on at a number of different dealerships."

Buchanan's office confirmed the lawmaker is a "passive investor" in five dealerships.

Overholt, who has shepherded numerous class-action lawsuits and is working with seven Buchanan whistle-blowers, speculated that it may be difficult for the lawmaker to distance himself from the allegations.

"With the documents we have, the knowledge of how car dealers operate ... his dealers' agreements, as well as the statements from our clients, there's no way Buchanan could not have known," Overholt said.

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